

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)
DAVID MAZZA,	)
	)
Plaintiff,	)
v.	)
	) Civil Act. No. 04-30020-MAP
VERIZON SICKNESS AND ACCIDENT	)
DISABILITY BENEFIT PLAN FOR	)
NEW ENGLAND ASSOCIATES, <i>et al.</i> ,	)
	)
Defendants.	)
_____	)

**MOTION FOR ENTRY OF APPEARANCE *PRO HAC VICE***

Defendants Verizon Sickness and Accident Disability Benefit Plan for New England Associates and Verizon Communications Inc. (“Verizon”) hereby move that Khuong G. (“David”) Phan of the law firm O’Melveny & Myers LLP, 1625 Eye Street, N.W., Washington, D.C., be admitted *pro hac vice* in the above case as defendants’ trial counsel with local counsel identified below, on the following grounds:

1. The law firm of O’Melveny & Myers LLP is national counsel to Verizon.
2. O’Melveny & Myers LLP has a long-standing attorney client relationship with Verizon.
3. Mr. Phan’s past experience in working with Verizon will enable him to handle this matter efficiently because of his knowledge of Verizon’s operations and his past experience with Verizon’s in-house counsel.

WHEREFORE, defendants respectfully request that this Court admit Mr. Phan *pro hac vice* in the above case as trial counsel. In support of this Motion, defendants respectfully refer this Court to the Affidavit of Khuong G. Phan filed herewith.

Dated: July 13, 2005

Respectfully submitted,

/s Amy D. Seifer

Amy D. Seifer, BBO 550639  
Lisa M. Birkdale, BBO 549663  
Verizon Communications Inc.  
Legal Department  
185 Franklin Street  
Boston, MA 02110-1585  
(607) 743-5764

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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DAVID MAZZA,

Plaintiff,

v.

VERIZON SICKNESS AND ACCIDENT  
DISABILITY BENEFIT PLAN FOR  
NEW ENGLAND ASSOCIATES, *et al.*,

Defendants.

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) Civil Act. No. 04-30020-MAP  
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**AFFIDAVIT OF KHUONG G. PHAN**

I, Khuong G. Phan do on oath hereby depose and state as follows:

1. I am an associate at the law firm of O'Melveny & Myers LLP, 1625 Eye Street, N.W., Washington, DC. I am a member in good standing of the Bars of New York and the District of Columbia, and there are no pending disciplinary proceedings against me in any jurisdiction in which I am admitted to practice.

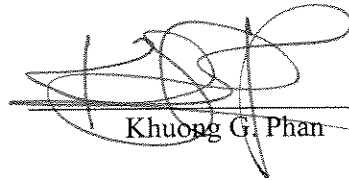
2. I make this affidavit in support of the Motion For Entry of Appearance *Pro Hac Vice* in this matter.

3. My law firm is national counsel to Verizon Communications Inc. ("Verizon") and has a long-standing attorney-client relationship with the defendant.

4. My past experience in working with Verizon will enable me to handle this matter efficiently because of my knowledge of Verizon's operations and my past experience with Verizon's in-house counsel.

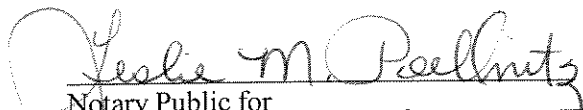
5. I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Massachusetts Supreme Judicial Court, as adopted by the Court as the standard of conduct for all Attorneys appearing before it.

Executed on July 7, 2005.



Khuong G. Phan

Subscribed and sworn to before me  
this 7th day of July, 2005.



Notary Public for  
My Commission expires July 31, 2007

LESLIE M. POELLNITZ  
Notary Public District Of Columbia  
My Commission Expires July 31, 2007

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing Motion for Entry of Appearance *Pro Hac Vice* and Affidavit of Khuong G. Phan was electronically filed via CM/ECF for the United States District Court for the District of Massachusetts. In addition, a copy of the foregoing document was served via first-class mail on this 13th day of, July 2005 on the following counsel of record:

Anthony G. Collins  
121 State Street, Suite 102  
Springfield, MA 01103  
(413) 746-9003

Counsel for Plaintiff

/s Amy D. Seifer\_\_\_\_\_